

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Kendall Garland

v.

Knorr

2:19-cv-2996

USDC-EDPA
CLERK

2020 JUN 16 A 9:44

Application For Reconsideration

1. Plaintiff, Kendall Garland hereby requests reconsideration of the Court's June 5, 2020 Order and Opinion and represents:
2. "THE GUARDIAN OF LIBERTY" is engraved in large capital letters near the top of the Federal Courthouse in Philadelphia.
3. Plaintiff sets forth that there can be no liberty or justice and there will not be any liberty or justice for ANYONE as long as this country's black citizens are systematically excluded from obtaining liberty and justice in the Courtroom.
4. A dismissal for "failure to state a claim" or "frivolous," especially a clearly erroneous one has never stood to preclude a claim on the merits if the defects in the filing can be made. (A clearly erroneous state court decision)
5. Plaintiff requests reconsideration of all claims in the complaint.
6. At the very least, the pleading requirements for Federal and state claims are not the same.

7. The dismissal of the complaint in this matter based on a clearly erroneous state court decision (and one that the Federal Courts need not follow... plaintiff also disagrees that the matter even meets the stated requirements for res judicata, however) is the very essence in it's purest form of "systemic exclusion," (however, plaintiff also disagrees in that the Court is not correct).

Wherefore, for each of the foregoing reasons, the plaintiff requests reconsideration of the Court's Order.

Respectfully submitted,

Kendall Garland

Kendall Garland

315 S. Broad Street

Philadelphia, PA 19107

June 14, 2020

"What good is having a law on the books, section 1983, if for whatever reason, the law can't or won't be enforced by the Courts. This must change!"

Certificate of Service

I, Kendall Garland, certify that the enclosed motion for reconsideration was served on the parties by first class mail as set forth below on 6/15/20:
(and also the notice of appeal)

Office of the Attorney General
1600 Arch Street
Third Floor
Philadelphia, PA 19103

City of Philadelphia
Law Department
Civil Rights Unit, 14th Floor
Philadelphia, PA 19102

Respectfully submitted,
Kendall Garland

Plaintiff, pro se
315 S. Broad Street
Philadelphia, PA 19107
June 15, 2020